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September 16, 2025

VIA USPS MAILING

Keith Allen, M21830
Attn: LEGAL MAIL
IDOC - Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

Re: *Allen v. Wexford Health Sources, Inc. et al.*, Case No. 23-CV-3775-DWD

Dear Mr. Allen:

I write on behalf of Defendant Nicholas Florence, M.D., regarding written discovery placed in the mail to you on July 25, 2025. Specifically, the following written discovery has been propounded upon you at this time, to which your responses were due 30 days later, on or about August 24, 2025:

1. Interrogatories to Plaintiff;
2. Requests for Production of Documents to Plaintiff; and
3. Requests to Admit to Plaintiff.

Accordingly, your discovery responses are overdue. Please provide complete written responses, or otherwise contact us, within fourteen (14) days of the date of this letter. If we do not receive your responses or hear from you by that deadline, we will proceed with a motion to compel as well as to deem our Requests to Admit admitted.

Respectfully Submitted,

Atlanta | Boston area | Chicago | Dallas-Fort Worth | Fort Lauderdale | Hartford area | Houston | Indiana
Kansas City | Las Vegas | Los Angeles area | Louisiana | Milwaukee | New Jersey | New York | Philadelphia
Phoenix | Pittsburgh | Providence | Salt Lake City | St. Louis | Tampa | West Virginia



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